

STEVEN T. JAFFE, ESQ.  
Nevada Bar No. 7035

[sjaffe@lawhjc.com](mailto:sjaffe@lawhjc.com)

KEVIN S. SMITH, ESQ.

Nevada Bar No. 007184

[ksmith@lawhjc.com](mailto:ksmith@lawhjc.com)

JONATHAN A. RICH, ESQ.

Nevada Bar No. 15312

[jrich@lawhjc.com](mailto:jrich@lawhjc.com)

**HALL JAFFE & CLAYTON, LLP**

7425 Peak Drive

Las Vegas, Nevada 89128

(702) 316-4111

Fax (702) 316-4114

*Attorneys for Defendant Lowe's Home  
Centers, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DANNY JACK HART and IRENE  
LINDSAY, individually,

Plaintiffs,

vs.

LOWE'S HOME CENTERS, LLC, a foreign  
corporation, DOE INDIVIDUALS 1-20,  
DOES 1-10, and ROE ENTITIES 1-20,

Defendants.

CASE NO. 2:20-cv-00773-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR PARTIES  
TO FILE OPPOSITION BRIEF TO  
PENDING MOTION**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs, DANNY JACK HART and IRENE LINDSAY HART, by and through their attorneys, E. Brent Bryson, Esq., of E. Brent Bryson, Ltd., and Defendant LOWE'S HOME CENTERS, LLC, by and through its attorneys, Steven T. Jaffe, Esq., Kevin S. Smith, Esq., and Jonathan A. Rich, Esq., of Hall Jaffe & Clayton, LLP, as follows:

///

///

///

1 That the deadline for Lowe's Home Centers, LLC to file an opposition brief to  
2 Plaintiff's Motion for Remand is extended for an additional seven (7) days beyond the current  
3 due date of March 21, 2022, until March 28, 2022.

4 DATED this 21<sup>st</sup> day of March 2022.

DATED this 21<sup>st</sup> day of March 2022.

5 HALL JAFFE & CLAYTON, LLP

E. BRENT BRYSON, LTD.

6  
7 By: /s/ Steven T. Jaffe  
Steven T. Jaffe, Esq.  
Nevada Bar No. 7035  
8 Kevin S. Smith, Esq.  
Nevada Bar No. 7134  
9 Jonathan A. Rich, Esq.  
Nevada Bar No. 15312  
10 7425 Peak Drive  
Las Vegas, Nevada 89128  
11 *Attorneys for Defendant*  
12 *Lowe's Home Centers, LLC*

By: /s/ E. Brent Bryson  
E. Brent Bryson, Esq.  
Nevada Bar No. 5452  
3202 West Charleston Blvd.  
Las Vegas, NV 89102  
*Attorneys for Plaintiff*  
*Danny Jack Hart*

**ORDER**

Based on the stipulation of the parties, the totality of the circumstances before the Court, and with good cause shown, the Court orders as follows:

IT IS ORDERED that the deadline for Lowe's Home Centers, LLC to file an opposition brief to Plaintiff's Motion for Remand is extended for an additional seven (7) days beyond the current due date of March 21, 2022, until March 28, 2022.

**IT IS SO ORDERED.**

Respectfully submitted by:

Dated this 22 day of March, 2022.

HALL JAFFE & CLAYTON, LLP

By: /s/ Jonathan A. Rich, Esq.

Steven T. Jaffe, Esq.

Nevada Bar No. 7035

Jonathan A. Rich, Esq.

Nevada Bar No. 15312

Kevin S. Smith, Esq.

Nevada Bar No. 7134

7425 Peak Drive

Las Vegas, Nevada 89128

*Attorneys for Defendant*

*Lowe's Home Centers, LLC*

  
Gloria M. Navarro, District Judge

UNITED STATES DISTRICT COURT

## Claudia Morrill

---

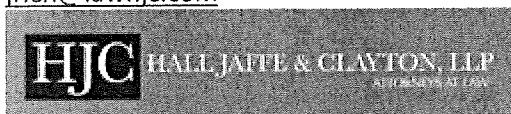
**From:** Jonathan A. Rich  
**Sent:** Monday, March 21, 2022 3:55 PM  
**To:** Claudia Morrill  
**Cc:** Steve Jaffe; Kevin Smith  
**Subject:** FW: Lowe's adv Hart re: Request for 48 hr extension to file opposition to motion to remand  
**Attachments:** SAO to Extend Deadline to File Opposition Brief.pdf

Claudia,

I just spoke with Plaintiff's counsel Brent Bryson, Esq., about five minutes ago and he gave us his authorization to submit the SAO.

Respectfully,

Jonathan A. Rich, Esq.  
HALL JAFFE & CLAYTON, LLP  
7425 Peak Drive  
Las Vegas, NV 89128  
Tel.: 702-316-4111  
Fax: 702-316-4114  
[jrich@lawhjc.com](mailto:jrich@lawhjc.com)



**From:** Jonathan A. Rich  
**Sent:** Monday, March 21, 2022 3:47 PM  
**To:** Eric Bryson <ebbesqltd@yahoo.com>  
**Cc:** Steve Jaffe <SJaffe@lawhjc.com>; Kevin Smith <KSmith@lawhjc.com>; Lisa Holding <LHolding@lawhjc.com>; Claudia Morrill <CMorrill@lawhjc.com>  
**Subject:** RE: Lowe's adv Hart re: Request for 48 hr extension to file opposition to motion to remand

Brent,

Thanks again for speaking with me this afternoon. Attached for your review is the proposed SAO to Extend the Deadline to File Opposition Brief. Please let me know if this is ok to submit.

Respectfully,

Jonathan A. Rich, Esq.